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 MORTGAGE LLC

11
 12 **UNITED STATES DISTRICT COURT**
 13 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
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15 NATIONSTAR MORTGAGE LLC,

16 Plaintiff,

17 vs.

18 PATRICK JOSEPH SORIA, an
 individual; WEST H&A, LLC, a
 19 Delaware Limited Liability Company;
 WARRANTED EFFECTUATION OF
 20 SUBSTITUTE TRANSFEREE INC,
 AKA W.E.S.T Inc., a Delaware
 21 Corporation; WESTWOOD LEGAL, a
 California Corporation; WESTWARD
 22 LEGAL, a California Corporation;
 BRIGHTON LEGAL GROUP, PC, a
 23 dissolved California Corporation; BLG
 PC NATIONAL BY BRIGHTON
 24 LEGAL GROUP, INC., a Delaware
 Corporation; DEUTSCHE MELLON
 25 NATIONAL ASSET, LLC, a Wyoming
 Limited Liability Company;
 26 CHRISTIANA WILMINGTON
 GLOBAL ASSET CORP., a Delaware
 27 Corporation; HSBC US IN ITS
 CAPACITY AS LEGAL TITLE
 28 HOLDER INCORPORATED. a

CASE NO. Not Yet Filed

**PLAINTIFF NATIONSTAR
 MORTGAGE LLC AND JERED T.
 EDE'S NOTICE OF RELATED
 CASE AND NOTICE OF
 PENDENCY OF OTHER ACTION**

JUDGE: Hon. NA
 TRIAL DATE: None Set

Delaware Corporation; CAMDEN
LEGAL GROUP, PC, a dissolved
California Corporation; TAMYRA
WHITE, an individual; GEORGE
WESLEY JR. PIERCE, an individual;
GRICELA MENDOZA, an individual;
BERNARD GERMANI, an individual;
REBEKAH BROWN, an individual;
MICHAEL C. JACKSON, an
individual; CYNTHIA LARA, an
individual; F. MARTINEZ, an
individual; JENNY DE LEON, an
individual; ELBA CHAVEZ, an
individual; RYAN ALEXANDER
URQUIZU, an individual; ROGER
FRANKLIN, an individual; AND
WHATEVER NAME THEY MAY DO
BUSINESS UNDER; and DOES 1
through 10 inclusive

Defendant.

**TO THE HONORABLE COURT, ALL PARTIES AND THEIR
ATTORNEYS OF RECORD:**

Plaintiff Nationstar Mortgage LLC (“Nationstar”) and Jered T. Ede (“Ede”) (collectively, “Nationstar”) hereby provide notice that this action, *Nationstar Mortgage LLC v. Patrick Joseph Soria, et al.* (“Soria”) is related to *Consumer Financial Protection Bureau v. Chance Edward Gordon, et al.*, Central District of California Case No. 2:12-cv-06147-PA-MRW (“Gordon”).

Under Central District Local Rule 83-1.3, two or more cases are “related” if they appear:

- (a) To arise from the same or closely related transaction, happening or event; or
- (b) To call for determination of the same or substantially related or similar questions of law and fact; or
- (c) For other reasons would entail substantial duplication of labor if heard by different judges; or

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(d) To involve the same patent, trademark or copyright, and one of the factors identified above in a, b, or c is present.

The *Soria* action and the *Gordon* actions are related under Local Rule 83-1.3 subds. (a), (b), and (c). They appear to arise from the same series of transactions, happenings, or events; call for the determination of the same, substantially related, and/or similar questions of law and fact; and would likely entail substantial duplication of labor if heard by different judges. Thus, pursuant to Local Rule 83-1.3, the *Soria* action should be reassigned to the Honorable Percy Anderson, the judge presiding over the earlier-filed *Gordon* action.

As detailed herein, the *Soria* action involves all or a material part of the subject matter of the *Gordon* action. (See L.R. 83-1.4.)

Closely Related Claims: *Soria* is an action brought by Plaintiff Nationstar Mortgage LLC, a mortgage loan servicer, to protect the interest of at least thirty-seven (37) properties that have been affected by a fraudulent mortgage relief scheme orchestrated by Patrick Joseph Soria (“Soria”), and the various affiliated business entities created by Soria, whereby Soria advertised services to assist financially distressed homeowners to assist with preventing future foreclosure proceedings. Soria, through his own actions and that of his various affiliated business entities, used unfair and deceptive practices, suggested that borrowers would receive mortgage relief and receiving up-front payments for mortgage relief services from borrowers and misrepresenting material aspects of his services. Soria, through his own actions, through the actions of co-Defendants, and through Soria's various affiliated business entities, caused to record fraudulent Wild Documents (“Hijacked Loans”) for no fewer than thirty-seven (37) properties (“Hijacked Properties”). The scheme, devised by Soria, conducted unlawful mortgage relief practices through an interrelated network of companies with common business functions, employees, and office locations.

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1 The *Gordon* action is also an action related to a fraudulent mortgage relief
 2 scheme brought in the interest of numerous mortgagors by the Consumer Financial
 3 Protection Bureau (“CFPB”) against Defendant Chance Edward Gordon
 4 (“Gordon”), and all of his related business entities, for orchestrating a fraudulent
 5 mortgage relief scheme. Like *Soria*, the Defendants in *Gordon* advertised their
 6 services to distressed homeowners, likely facing foreclosure, to assist with mortgage
 7 relief services that did not benefit the borrowers. The Defendants in *Gordon* also
 8 charged the distressed homeowners fees for the fraudulent services.

9 The similarity in both of these cases is not surprising given the eagerness for
 10 homeowners experiencing hardship to seek out assistance through companies
 11 advertising services for mortgage relief assistance. Homeowners experiencing
 12 hardship are likely to fall prey to fraudulent schemes like that in *Gordon* and *Soria*,
 13 which do not benefit the Homeowner, servicer, or investor.

14 **Relating or Consolidating These Cases Will Prevent Substantial**

15 **Duplication of Effort:** Consolidating or relating these cases will prevent
 16 substantial duplication of effort. The *Gordon* action has been pending since July 18,
 17 2012 and significant litigation has occurred. Because the cases concern the same
 18 legal backdrop, and near identical claims, the parties will likely be forced to litigate
 19 legal questions that have been, or will be, before the Hon. Percy Anderson in the
 20 *Gordon* matter. Accordingly, judicial effort and the parties’ resources will be
 21 conserved if the *Soria* matter is deemed related to the *Gordon* matter and transferred
 22 to Judge Anderson.

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1 Assignment of the *Soria* matter to Judge Anderson will promote judicial
2 economy and also conserve the resources of the parties. Accordingly, Nationstar
3 respectfully requests that the Court deem the *Soria* matter related to the *Gordon*
4 matter and assign it to Judge Anderson.

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6 DATED: April 11, 2018

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